



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

NOV 27 2013

REPLY TO THE ATTENTION OF:

E-19J

Cliff Whyte  
NEPA Compliance Officer  
U.S. Department of Energy  
National Energy Technology Laboratory  
3610 Collins Ferry Road  
Morgantown, West Virginia 26507

**Re: Final Environmental Impact Statement, FutureGen 2.0 Project, Morgan County,  
Illinois – CEQ # 20130314**

Dear Mr. Whyte:

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement (EIS) for the FutureGen 2.0 Project in Morgan County, Illinois. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The Department of Energy (DOE) is proposing \$1 billion in financial assistance to the FutureGen Industrial Alliance (the Alliance) to upgrade a coal-fired power plant in Meredosia, Illinois with oxy-combustion and carbon capture technologies and to construct a 30-mile pipeline to transport the captured carbon to injection wells. The captured carbon dioxide (CO<sub>2</sub>) would be injected into a geologic formation for permanent storage.

In our June 10, 2013 comment letter on the Draft EIS, we requested clarification on issues related to diesel emissions reduction during construction, the Underground Injection Control (UIC) permitting process, green infrastructure, fine particulate matter (PM<sub>2.5</sub>) Prevention of Significant Deterioration (PSD) increments, and greenhouse gas analyses.

Based on our review of the Final EIS, EPA has no further comment on diesel emissions reduction, green infrastructure, PSD increments and greenhouse gas analyses. Because the UIC permitting process is still underway, EPA reserves the right to provide information and comments on the UIC permit in that context.

EPA has a remaining comment on issues related to fine particulate matter. The Final EIS states that the PM<sub>2.5</sub> 24-hour National Ambient Air Quality Standard will be violated at nine receptors due mostly to emissions from nearby sources, based on air quality model estimates. The Final EIS also indicates that the FutureGen 2.0 project will be a significant contributor to the modeled violations of the PM<sub>2.5</sub> ambient air quality standard (i.e., will contribute more than 1.2 ug/m<sup>3</sup>). The Final EIS addresses this significant contribution by stating that the specific emission factors may differ when the actual equipment is installed and/or stack heights may be adjusted to resolve the adverse impact to the standard. However, any solution to an ambient air quality standard must be determined before a construction permit is issued. See the following provision from the Illinois Administrative Code:

***Section 201.141 Prohibition of Air Pollution***

*No person shall cause or threaten or allow the discharge or emission of any contaminant into the environment in any State so as, either alone or in combination with contaminants from other sources, to cause or tend to cause air pollution in Illinois, or so as to violate the provisions of this Chapter, or so as to prevent the attainment or maintenance of any applicable ambient air quality standard.*

**Recommendation:** EPA recommends that the ROD require either: 1) a more detailed and refined analysis that demonstrates the FutureGen 2.0 project is not a significant contributor to an ambient air quality standard violation, or 2) appropriate controls/limitations to assure that the FutureGen 2.0 project is not a significant contributor to an ambient air quality standard violation.

Thank you again for your consideration of our comments to reduce impacts to human health and the environment. Please send us a copy of the ROD when it becomes available. If you have any questions, please contact me or Elizabeth Poole of my staff at 312-353-2087 or poole.elizabeth@epa.gov.

Sincerely,



Kenneth A. Westlake  
Chief, NEPA Implementation Section  
Office of Enforcement and Compliance Assurance

cc: Bob Bernoteit, Illinois Environmental Protection Agency